



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION  
OFFICE OF PESTICIDE PROGRAMS REGISTRATION DIVISION (7505P)

**DOCUMENT CONTAINS CONFIDENTIAL BUSINESS INFORMATION**

**DP BARCODE No.:** D441399; **FILE SYMBOL No.:** 91234-GG; **PRODUCT NAME:** A117.02; **DECISION No.:** 529609; **PC Code(s):** 097601; **ACTION CODE:** R300; **FOOD Use:** Yes

**DATE OUT:** July 19, 2017

**SUBJECT:** End Use Product Chemistry Review  
Product Name: A117.02

**FROM:** Shyam Mathur, Ph. D  
Chemistry Team Leader  
Chemistry, Inerts & Toxicology Assessment Branch (CITAB) /RD (7505P)

*S Mathur*  
7-19-17

**TO:** Carmen Rodia / Richard Gebken, RM 10; I-V Branch 2 / RD (7505P)

**INTRODUCTION:**

The registrant has submitted an application for the registration of the new end use product A117.02. The registrant has submitted a CSF for basic formulation dated May 4, 2017 and the supporting product chemistry data with MRID Nos. 50158401 to 50158404. The registrant has claimed that the proposed is substantially similar or identical to the registered product with Reg. No. 400-154. CITAB has been asked to determine the acceptability of the proposed basic CSF, the supporting product chemistry data and also determine similarity to the cited product.

**SUMMARY OF FINDINGS:**

1. Name of Active Ingredient(s): Propargite (69.6%)
2. Has the registrant claimed substantial similarity to a registered product?  
[X] Yes; [ ] No; [ ] NA; if yes give the registration number of the cited product.  
EPA Reg. No: 400-154
3. All of the source materials of the active ingredient are derived from registered sources- [X] Yes [ ] No
4. All inert ingredients have been screened by CITAB (Inert group) and found to be approved for the proposed labeled uses.

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5. Confidential Statement of Formula(s):

☒ Basic - Dated: 05-04-2017; Re-submitted - Dated:

☐ Alternate CSF – All Dated: ; Re-submitted alt CSF – Dated:

Alternate CSF(s) complies with 40CFR§152.43: ☐ Yes; ☐ No; ☒ NA

6. Product label

- a. Ingredient statement: Nominal concentration of AI listed on CSF(s) concurs with product label (PR Notice 91-2).

☒ Yes; ☐ No; if not, explain below:

Is the sub statement in compliance with PR Notice 97-6 (inert ingredient vs other ingredients)

☒ Yes; ☐ No; if not, explain below:

Metallic equivalent:	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> NA
Soluble arsenic:	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> NA
Isomeric ratios:	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> NA
Acid Equivalent:	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> NA:

- b. Health related sub statements: Product contains?

Petroleum distillate at > 10%:	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> NA
Methanol at > 4%:	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> NA
Sodium nitrate/Sodium nitrite	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> NA

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- c. Physical chemical hazard statement: Product label requires a statement per 40 CFR §156.78 for: flammability, explosive potential or electric insulator breakdown?

☒ Yes; ☐ No

Is the sub statement in compliance with PR Notice 98-6 (Total Release Fogger)?

☐ Yes; ☐ No; ☒ NA; if not, explain below

- d. Label requires an additional Storage and Disposal statement:

☐ Yes; ☒ No; if yes explain below:

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7. Group A: Product Chemistry Data submitted

CITAB's determination of the acceptability for the proposed product is listed in the tables below.

Guideline No.	Study Title		Data submitted		CITAB's Assessment of Data	MRID Nos. Cited
			Yes	No		
830.1550	Product Identity & Composition		X		A	50258401
830.1600	Description of materials used to produce the product		X		A	50258401
830.1650	Description of formulation process		X		A	50258401
830.1670	Discussion on the formation of impurities		X		A	50258401
830.1700	Preliminary analysis			X	NA	
830.1750	Certified limits (158.350)	Standard certified limits	X		A	Basic CSF dated 05-04-2017
		Proposed Limits				
		Justification for wider limits				
830.1800	Enforcement analytical method		X		A	50258401

A = Acceptance, N = Not Acceptable, G = Data Gap, W = Waiver Request, I = In Progress, NA = Not Applicable; U = Upgradeable.

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8. Group B: Product chemistry data submitted

Guideline No.	Study Title	Value or Qualitative Description cited	CITAB's Assessment of Data	MRID Nos.
830.6303	Physical State	Liquid	A	50258402
830.6315	Flammability	115°F	A	50258402
830.6316	Explodability	TS is not potentially explosive	A	50258404
830.7000	pH	5.70 at 25°C	A	50258402
830.7300	Density (units)	1.045 g/cc (8.71 lbs/gal) at 25°C 1.035 g/CC (8.63 lbs/gal) @ 39°C	A	50258402
830.7100	Viscosity	106 cps at 25°C 39.9 cps @ 39°C	A	50258402
830.6317	Storage stability	Stable for 2 weeks at 54°C when stored in Fluorinated-HDPE containers	A	50258403
830.6320	Corrosion characteristics	No corrosion observed when stored in Fluorinated-HDPE containers for 2 weeks at 54°C	A	50258403
830.6314	Oxidation/reduction	Compatible with water, Fe powder, 5% ammonium phosphate and Aromatic 100 Fluid. Incompatible with 5% KMnO <sub>4</sub>	A	50258402

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**Group B data Waiver requests**  
(MRID No. 50258404)

The applicant has submitted the waiver requests for the following physical-chemical characteristics:

Atticus, LLC has conducted and is submitting data on the color, odor, physical state, oxidation/reduction, flammability, pH, viscosity and density of A117.02. Atticus, LLC is requesting waivers for the following data requirements:

Guideline No.	Title	Discussion
830.6313	Stability to Normal and Elevated Temperatures, Metals, and Metal Ions	Per OPPTS 830.1000, these data are not required for the registration of an end-use product.
830.6316	Explosibility	This product does not have explosive characteristics; therefore, Atticus, LLC requests a waiver for this data requirement. Please refer to the Confidential Statement of Formula for additional information on the composition of A117.02.
830.6319	Miscibility	A117.02 is a soluble liquid and not an emulsifiable concentrate; therefore, these data are not applicable nor are these data required.
830.6321	Dielectric breakdown voltage	This product is not proposed for use around electrical equipment; therefore, Atticus, LLC requests a waiver for this data requirement.
830.7050	UV/Visible Absorption	Per OPPTS 830.1000, these data are not required for the registration of an end-use product.
830.7200	Melting Point/Melting Range	Per OPPTS 830.1000, these data are not required for the registration of an end-use product.
830.7220	Boiling Point/Boiling Range	Per OPPTS 830.1000, these data are not required for the registration of an end-use product.
830.7370	Dissociation Constants in Water	Per OPPTS 830.1000, these data are not required for the registration of an end-use product.
830.7520	Particle size, fiber length, diameter distribution	A117.02 is not water insoluble and is not a fibrous material; therefore, Atticus, LLC requests a waiver for this data requirement.
830.7550 – 830.7570	Partition Coefficients	Per OPPTS 830.1000, these data are not required for the registration of an end-use product.
830.7840 – 830.7860	Water Solubility	Per OPPTS 830.1000, these data are not required for the registration of an end-use product.

Guideline No.	Title	Discussion
830.7950	Vapor Pressure	Per OPPTS 830.1000, these data are not required for the registration of an end-use product.

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**CONCLUSIONS:**

CITAB has reviewed the product chemistry data submitted for the end-use product and has concluded that:

**A. Substantial similarity to the cited product (Reg. No. 400-154) from Product chemistry view point**

☐ Similar

☒ Not similar, give reasons: There is significant difference in the flash point value of the proposed and cited products (115°F in proposed product vs 171°F in the cited product). The proposed product requires warning on the label for demonstrate incompatibility to oxidizing agents whereas the cited product does not have it.

☐ Identical

☐ Not identical

☐ Not applicable

**B. Confidential Statement of formula**

1. Basic CSF (dated: 05-04-2017)

☒ Acceptable

☐ Not Acceptable:

☐ Not Applicable

2. Alternate CSF's (all dated: )

☐ Acceptable

☐ Not Acceptable:

☒ Not Applicable

**C. Group A Product Chemistry Data**

☒ Acceptable

☐ Acceptable with the exception of the guideline:

☐ Not acceptable

☐ Not required

☐ Data cited

**D. Group B Product chemistry data**

☒ Acceptable

☐ Not acceptable

☐ Acceptable with the exception of the guidelines

☐ Not required

☐ Data cited

☒ Waiver requests – ☒ Acceptable; ☐ Not Acceptable, ☐ Not applicable

**E. Product Label/Draft Label: Recommendations – Yes ☒; No ☐**

**Note:** The following statement is required on the product label since the product was found to be incompatible to oxidizing agents. The Draft product label already has this warning:

“Do not mix or allow coming in contact with oxidizing agent. Hazardous Chemical reaction may occur”



Label

Proposed 91234-66 91234-66  
Label

## ENGINEERING CONTROLS

**Mixers and loaders supporting aerial applications to corn and cotton must:** use a closed system that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240(d)(4), and must:

- Wear the personal protective equipment required above for mixers/loaders,
- Wear protective eyewear if the system operates under pressure, and
- Be provided and must have it immediately available for use in an emergency, such as a broken package, spill, or equipment breakdown: coveralls, chemical-resistant footwear, and a NIOSH approved respirator with an organic vapor removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval prefix TC-23C), or a canister approved for pesticides (MSHA/NIOSH approval prefix TC-14G), or an organic vapor cartridge or canister with N, R, P or HE prefilter, and Chemical-resistant headgear, if overhead exposure.

**Applicators using airblast spray equipment must:**

- Wear the personal protective equipment required above for mixers and loaders,
- Be provided and must have immediately available for use when they enter the treated area: coveralls, chemical-resistant gloves, chemical-resistant footwear, chemical-resistant headgear if overhead exposure, and a NIOSH approved respirator with an organic vapor removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval prefix TC-23C) or a canister approved for pesticides (MSHA/NIOSH approval prefix TC-14G), or an organic vapor cartridge or canister with N, R, P, or HE prefilter.
- Take off any PPE that was worn in the treated area before reentering the cab if the applicators are operating in a closed cab, and
- Store all such PPE in a chemical-resistant container, such as plastic bag, to prevent contamination of the inside of the cab or other enclosed area.

Direct flaggers need to wear the personal protective equipment required above for mixers/loaders, and applicators/handlers, unless they are in an enclosed vehicle which need not be pressurized. When handlers and/or applicators use closed systems, enclosed cabs, or aircraft in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240(d)(4-6), the PPE requirements may be reduced or modified as specified in the WPS.

## ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish and aquatic invertebrates and may cause reproductive effects in wildlife. Do not apply directly to water or areas where surface water is present or to intertidal areas below the mean high water mark. Runoff from treated areas may be hazardous to aquatic organisms in neighboring areas. Do not contaminate water when disposing of equipment wash water.

## PHYSICAL OR CHEMICAL HAZARDS

Combustible. Do not use or store this product near heat or open flame. Do not mix or allow coming into contact with oxidizing agents. Hazardous chemical reaction may occur.



## PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

### DANGER

Corrosive. Causes irreversible eye damage. Causes skin burns. May be fatal if inhaled. Harmful if swallowed. Do not get in eyes, on skin or clothing. Wear protective eyewear such as goggles, face shield or safety glasses. Wear coveralls over long sleeved shirt and long pants, chemical resistant footwear and socks, chemical resistant gloves (such as barrier laminate, butyl rubber, nitrile rubber, viton, selection category E). Do not breathe spray mist. For handling activities use a NIOSH approved respirator with an organic vapor removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C), or a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G), or an organic vapor cartridge or canister with any N, R, P or HE prefilter. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco. Remove contaminated clothing and wash clothing before reuse.

### PERSONAL PROTECTIVE EQUIPMENT (PPE)

Some materials that are chemical-resistant to this product are listed below. For more options, follow the instructions for category E on an EPA chemical-resistant category selection chart.

#### All Mixers, Loaders, and Applicators and Handlers Must Wear:

- Coveralls over long-sleeved shirt and long pants
- Chemical resistant footwear and socks
- Goggles, face shield or safety glasses
- Chemical resistant gloves such as nitrile rubber, butyl rubber, viton and/or barrier laminate, except for flaggers and applicators using closed cabs
- Chemical resistant apron for mixers and loaders and persons exposed to the concentrate.
- For overhead exposure wear chemical resistant headgear.

See Engineering Controls for further requirements.

### USER SAFETY REQUIREMENTS

Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them. Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

### USER SAFETY RECOMMENDATIONS

Users should:

- Remove clothing/PPE immediately if pesticide gets inside.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, change into clean clothing and follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water.
- Keep and wash PPE separately from the laundry.

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